

BEFORE THE
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

)	
Proceeding by the Department of)	
Telecommunications and Energy on its own)	D.T.E. 02-28
Motion to Develop Requirements for Mass)	
Migrations of Telecommunications Service)	
End-Users)	
)	

PETITION TO INTERVENE OF
ALLEGIANCE TELECOM OF MASSACHUSETTS, INC.

Allegiance Telecom of Massachusetts, Inc. (“Allegiance”), pursuant to 220 C.M. R. 1.03, hereby petitions the Department of Telecommunications and Energy for leave to intervene in the above-captioned proceeding. In support of this petition, Allegiance states as follows:

1. Allegiance is a corporation organized under the laws of the State of Delaware, with its principal place of business at 9201 North Central Expressway, Dallas, Texas 75231.
2. Allegiance is a facilities-based competitive local exchange carrier (“CLEC”) authorized to provide, and currently providing, local exchange services in the State of Massachusetts.
3. Allegiance’s interests will be affected substantially and specifically by the Commission’s decision in this matter. As a CLEC operating in the State of Massachusetts, Allegiance will be affected by any proposed rules that will require the coordination of customer base migration when a CLEC leaves the market in Massachusetts.
4. Allegiance requests intervention in the case as a full party of record. Allegiance’s rights and interests in this matter will not adequately be represented by any other party and its participation herein will not unduly delay these proceedings.

5 Allegiance requests that all documents and communications regarding this proceeding be sent to:

Mary C. Albert
Morton J. Posner
Allegiance Telecom of Massachusetts, Inc.
1919 M Street, N.W.
Suite 420
Washington, DC 20036

Wherefore, Allegiance Telecom of Massachusetts, Inc. respectfully requests that the Department grant its Petition to Intervene.

Respectfully submitted,

Morton J. Posner
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Dated: June 25, 2002